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To: CEQA Guidelines
Subject: comments on preliminary discussion draft changes, CEQA Guidelines

Hello

Please see below my comments on the preliminary draft changes to CEQA guidelines; all of the comments pertain to Appendix G. I thank you for considering my comments.

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Section	Threshold	Proposed Change	Comment
Hydrology	General	Most of the specific flood hazard questions (dam failure, etc.) have been deleted, replaced with generic question in Hazards about <i>flooding or other inundation</i> .	The existing dam failure, tsunami, and mudflow questions seem worthwhile to me. Replaced by new threshold XI.d.i asking about areas subject to <i>periodic inundation</i> , which are different types of flooding (coasts, wetlands, riparian, flood zones)
XI. Open space, managed resources...	General		Natural hazards (geo, some flood hazards, etc.) are fundamentally different than impacts related to uses of natural resources (ag, minerals, etc.). I would split this new section into 2 sections.
	b.ix mineral resource		This threshold is much more generic than the existing threshold (... <i>mineral resource that would be of value to the region and residents of the state</i>) and will be much more work to analyze.
XVIII. Wildfire	Intro	If located in or near state responsibility areas or lands classified	Why is analysis of state responsibility areas (vs. local or federal

		as very high fire hazard severity zones	responsibility areas) important?
Global	---	Duplication of some thresholds	While some existing duplication of thresholds has been eliminated, other duplication has been added in several places (see below) – e.g. with new threshold XI.a.i, <i>Habitat Required....</i> , which duplicates multiple Bio thresholds. Sometimes a dead horse is really dead. Who benefits- and how- by us analyzing the same questions over and over?

Proposed added duplication:

Proposed threshold	Duplicates existing threshold	Duplicates other proposed threshold
XI.a.i. Habitats required for the preservation of fish and wildlife species, including habitat corridors	Bio a and d	
XI.b.vii impeding groundwater recharge	Hyd b	
XI.b.viii causing substantial soil erosion or...		Hydro c.i
XI.d.ii wildfire hazard areas		Section XVIII, <i>Wildfire</i>